

Message

From: Jones, Russell [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4795FDC630C34BE4AED0C6416A20D606-RUSSELL JONES]
Sent: 5/30/2019 3:55:48 PM
To: Simons, Eddie (AGR) [ESimons@agr.wa.gov]; Schulze, Chad [Schulze.Chad@epa.gov]
Subject: RE: Fertilizer Registration

Portuguese!!! No wonder I didn't understand it. All I know of that language is that they pronounce their "R" as a "H."

FYI: CPPAs = Complex Polymeric Polyhydroxy Acids (the overly fancy name for the mix of Humic/fulvic acids and tannins)

From: Simons, Eddie (AGR) <ESimons@agr.wa.gov>
Sent: Thursday, May 30, 2019 11:37 AM
To: Jones, Russell <Jones.Russell@epa.gov>; Schulze, Chad <Schulze.Chad@epa.gov>
Subject: RE: Fertilizer Registration

Russ,

Your Portuguese must be rusty as well. The official language of Brazil is Portuguese. (I used Google Translate in my Chrome internet browser.) FYI – the reply from ADAMA indicated that they will contact BPPD to have their product reviewed.

Thanks for the info on the other materials. Another specialist here has been registering the CPPAs so I was not aware of that term. It is always good to see info like this.

Thanks, and have a great day.

Eddie Simons
WSDA

From: Jones, Russell [mailto:Jones.Russell@epa.gov]
Sent: Thursday, May 30, 2019 6:20 AM
To: Simons, Eddie (AGR) <ESimons@agr.wa.gov>; Schulze, Chad <Schulze.Chad@epa.gov>
Subject: RE: Fertilizer Registration

My Spanish is not very good, so the website was a bit opaque to me, but the label shows extract of Ascophyllum nodosum (kelp/seaweed) that is applied at a few liters per acre for the purpose of "crop enhancement."

My two cents = This product is a Plant Regulator.

BTW: Fulvic Acids. EPA has registered CPPAs (mix of humic/fulvic acids and tannins; the mixture has plant regulator properties. Distinguishing between humic and fulvic acids is a bit muddy to me.

However, recent literature appears to support that Fulvic acids (if they can be isolated and identified as such) are not plant regulators, but seem to act as facilitators of nutrient absorption into roots and (presumably) leaves. The jury is out on whether Tannins alone have plant regulator activity.

Humic acids have been shown to have auxin like properties when applied to foliage and would be considered Plant Regulators.

Russ J

Russell S. Jones, Ph.D., Senior Scientist
Chair, Biochemical Classification Committee
Risk Assessment Branch
Biopesticides & Pollution Prevention Division
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<http://www.epa.gov/pesticides>



From: Simons, Eddie (AGR) <ESimons@agr.wa.gov>
Sent: Wednesday, May 29, 2019 3:15 PM
To: Jones, Russell <Jones.Russell@epa.gov>; Schulze, Chad <Schulze.Chad@epa.gov>
Subject: FW: Fertilizer Registration

FYI – I also found the product on the ADAMA Brazil website with some interesting claims.

<https://www.adama.com/brasil/pt/produtos/fertilizantes-e-estimulantes/expertgrow.html>

<https://www.adama.com/brasil/pt/sala-de-imprensa/2015/expertgrow.html>

Eddie Simons
WSDA

From: Simons, Eddie (AGR)
Sent: Wednesday, May 29, 2019 12:06 PM
To: 'Jessica Vigna' <jessica.vigna@adama.com>
Cc: Foss, Steve (AGR) <SFoss@agr.wa.gov>; bppdquestions@epa.gov
Subject: RE: Fertilizer Registration

Hello Jessica,

I am unable to approve product labels without a complete application. I do recommend, however, that you review the **WSDA Fertilizer Registration Guidance Document** prior to submission of the application. This document, and the information needed for a complete fertilizer registration application can be found on our website at:
<https://agr.wa.gov/departments/pesticides-and-fertilizers/fertilizers/new-product-checklist>.

NOTE: WSDA Registration and Licensing Services (Pesticide Management Division) registers products that meet the definitions of a pesticide (including Plant Regulators) or a commercial fertilizer. We do not register products that are solely soil or plant amendments. In addition to the WSDA fertilizer guidance, I recommend that you refer to the EPA **"Draft Guidance for Plant Regulator Label Claims, Including Plant Biostimulants"** document found at: <https://www.regulations.gov/document?D=EPA-HQ-OPP-2018-0258-0002>. I also suggest that you contact EPA Biopesticide and Pollution Prevention Division (BPPD) at: bppdquestions@epa.gov for a determination on whether your product would require registration as a pesticide.

Regards,

Eddie Simons

Registration Specialist

Washington State Department of Agriculture

Pesticide Management Division

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From: Jessica Vigna [<mailto:jessica.vigna@adama.com>]

Sent: Wednesday, May 29, 2019 7:44 AM

To: Simons, Eddie (AGR) <ESimons@agr.wa.gov>

Subject: FW: Fertilizer Registration

Hi Eddie,

Could you please take a look at the label attached and tell me if the label is ok to be registered in WA? What are the requirements for a new fertilizer registration in WA? For the product attached.

Thank you very much,



Jessica Vigna

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ADAMA

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From: Jessica Vigna

Sent: Wednesday, May 29, 2019 10:41 AM

To: Foss, Steve (AGR) <SFoss@agr.wa.gov>

Subject: Fertilizer Registration

Hello Steve,

ADAMA is seeking to register the attached product in WA. What is required to register a new product in WA? Also, could you tell me if the label is ok with WA requirements?

Thanks,



Jessica Vigna
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